

EXHIBIT A

7/24/2019 3:36 PM
19CV32920

COPY

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

MARIA VAZQUEZ,

Case No.

Plaintiff,

**COMPLAINT FOR PERSONAL
INJURIES**

v.

CLAIM SUBJECT TO ORS 21.160(1)(c)

LUIS VALENZUELA and VECTOR

(CLAIM NOT SUBJECT TO
MANDATORY ARBITRATION)

XPRESS, LLC, a Texas Limited Liability

Company,

PRAYER FOR \$376,968.63

Defendant.

Plaintiff alleges:

1.

At all times relevant herein, Interstate 5 is a public highway located in Multnomah
County, Oregon.

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2.

On August 26, 2017, plaintiff was the seat-belted passenger of a Nissan Pathfinder, traveling southbound on Interstate 5. Just after crossing the I-5 bridge from Washington to Oregon, the vehicle in which plaintiff was traveling stopped with the traffic in front of it. Defendant Luis Valenzuela, driving a semi truck directly behind plaintiff, failed to slow and collided with the rear of plaintiff's vehicle, causing the injuries and damages described below.

3.

At the time and place alleged in paragraph 2, defendant Luis Valenzuela was in the course and scope of his employment with defendant Vector Xpress. His actions and negligence are herein imputed to defendant Vector Xpress.

4.

The collision was caused by defendants' negligence in one or more of the following particulars:

- (a) In failing to maintain proper control of his vehicle;
- (b) In failing to maintain a proper lookout for other vehicles on the roadway; and
- (c) In failing to stop, swerve or otherwise avoid a collision with plaintiff.

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COMPLAINT FOR PERSONAL INJURIES

Vazquez v. Valenzuela and Vector Xpress, LLC, Multnomah County Circuit Court Case No. _____

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5.

As a direct, proximate and foreseeable result of defendants' negligence, plaintiff sustained injuries to the muscles and ligaments of her neck, shoulders and back. Plaintiff sustained disc injuries at C4-5 and C5-6 and had to undergo surgery for her injuries. As a result of the surgery, she has a scar across the front of her neck.

These injuries have caused plaintiff physical pain, disability, mental distress and interference with her normal lifestyle. These injuries required medical care and caused plaintiff to incur medical expenses for that care.

6.

As a direct, proximate and foreseeable result of the defendants' negligence, plaintiff suffered non-economic damages in a sum not to exceed \$250,000.

7.

As a further direct, proximate and foreseeable result of the defendants' negligence, plaintiff incurred economic damages in a sum of \$126,968.63.

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2 WHEREFORE, after establishing the above allegations, Plaintiff prays for
3 judgment in her favor as follows:

- 4 A. Non-economic damages in a sum not to exceed \$250,000;
5 B. Economic damages in a sum of \$126,968.63;
6 C. Costs and disbursements incurred herein; and
7 D. Any other relief the Court deems equitable.

8 DATED this 24th day of July, 2019.

9
10 /s/ Jennelle D. Gonzales.
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